



LAW OFFICE of
JULIA KEFALINOS

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VIA CMECF

Honorable Valerie E. Caproni
United States District Court Judge
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007-1312

MEMO ENDORSED

Re: **U.S. v. Maria Fernanda Gutierrez Ospino** 20-cr-00102-VEC
U.S. v. Jose Andre Urena Sancho 20-cr-00102-VEC

Dear Judge Caproni:

I write on behalf of my client, Maria Fernanda Gutierrez Ospino, joined by AFD Ariel Werner on behalf of her client, Jose Andre Urena Sancho, and with the consent of the Government to request a two-month adjournment of the status conference scheduled for May 18, 2020 in the above referenced case for the following reasons:

1. Ms. Gutierrez-Ospino recently gave birth and is nursing her baby. Her recovery time will be longer than that of a normal birth because she had a C-Section. Due to Ms. Gutierrez-Ospino's delicate health condition, and the baby's age, it is unsafe for them to travel until the circumstances of the COVID 19 pandemic improve.
2. The uncertainty of the current travel restrictions and limitations on court proceedings in place due to the COVID-19 pandemic.
3. The defendants' inability to properly conference with their attorneys regarding the extensive discovery in this case.

The parties' consent to the exclusion of time under the Speedy Trial Act through the next conference date scheduled by the court. Thank you for your consideration of this request.

Respectfully submitted,

/s/Julia Kefalinos, Esq

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cc: Ariel Werner AFD
Samuel Rothschild, Assistant U.S. Attorney

The May 18 conference is adjourned to **June 17, 2020, at 11:00 A.M.** If necessary, the Court will consider a motion for Ms. Ospina to appear via video. Any such request must be made by **June 3, 2020.**

Time is excluded from now until the next conference pursuant to 18 U.S.C. § 3161(h)(7) because the interests of public health and defendants' right to review discovery and prepare for trial outweigh the interests in a speedy trial.

SO ORDERED.

Date: 04/16/2020



HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE